

DISTRICT JUDGE BENJAMIN H. SETTLE  
MAGISTRATE JUDGE J. RICHARD CREATURA

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

NATHAN ROBERT GONINAN, a.k.a.  
NONNIE M. LOTUSFLOWER

Plaintiff,

v.

WASHINGTON DEPARTMENT OF  
CORRECTIONS, et al.,

Defendants.

NO. 3:17-cv-05714-BHS-JRC

DECLARATION OF ELEANOR  
VERNELL IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT

I, ELEANOR VERNELL, make the following declaration:

1. I have knowledge of the facts herein, am over eighteen years of age, and am competent to testify to such facts.

2. I have been employed by the Washington State Department of Corrections since 1984. In July 2017, I was appointed to the position of Prisons Deputy Director, Command B at DOC Headquarters in Olympia, Washington. As Prisons Deputy Director, I oversee four of DOC's twelve prison institutions. This includes the Washington State Penitentiary, Mission Creek Corrections Center for Women, Coyote Ridge Corrections Center, and Washington Corrections Center for Women. I possess extensive knowledge of the Department's safety,


1 security and administrative concerns and am very familiar with Department prison operations,  
2 policies, goals and programs.

3 3. I do not have the education or training to make determinations regarding inmate  
4 medical or mental health treatment decisions. Nor do my job duties require or provide that I have  
5 any medical decision making authority. That authority is provided to the Department's Health  
6 Services staff.

7 4. According to Department records, the Plaintiff is currently housed at the  
8 Monroe Correctional Complex in the Residential Treatment Unit of the Special Housing Unit  
9 in Monroe, Washington. This is not a prison that I am tasked with overseeing.

10 I declare under the penalty of perjury that the foregoing is true and correct to the best of  
11 my knowledge.

12 EXECUTED this \_\_15\_\_ day of March, 2019, at Tumwater, Washington.

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15 ELEANOR VERNELL  
16 Deputy Director Prisons  
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**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing Declaration of Eleanor Vernell in Support of Defendants' Motion for Partial Summary Judgment to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

ANTOINETTE MARIE DAVIS      [tdavis@aclu-wa.org](mailto:tdavis@aclu-wa.org)

KRISTINA MARKOSOVA      [kristinamarkosova@dwt.com](mailto:kristinamarkosova@dwt.com)

BENJAMIN BYERS      [bbyers@corrchronin.com](mailto:bbyers@corrchronin.com)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 15<sup>th</sup> day of March, 2019, at Spokane, Washington.



PATTY WILLOUGHBY

Legal Assistant III

Corrections Division

1116 West Riverside Avenue, Suite 100

Spokane, WA 99201-1106

(509) 456-3123

[PattyW@atg.wa.gov](mailto:PattyW@atg.wa.gov)